

GRB USAO 2013R00680

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
2014 APR 25  
IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF MARYLAND  
CLERK'S OFFICE  
AT BALTIMORE

BY  
UNITED STATES OF AMERICA

DEPUTY

v.

LYNNETTE C. JACKSON,  
Defendant

Criminal Number:

WDQ-14-0202

False, Fictitious or Fraudulent Claims,  
18 U.S.C. § 287; Aiding and Abetting,  
18 U.S.C. § 2

INFORMATION

The United States Attorney for the District of Maryland charges that:

INTRODUCTION

At all times relevant to this Information:

1. Defendant **LYNNETTE C. JACKSON** resided in Hanover, Maryland.
2. The National Security Agency ("NSA") was a component of the U.S. Department of Defense ("DoD"), which was part of the executive branch of the United States Government.
3. NSA contracted with Science Applications International Corporation ("SAIC") for Contract No. H98230-08-C-0709, hereinafter referred to as the "Fibonacci" contract.
4. Merito, Incorporated ("Merito") is a DoD contractor subcontracted by SAIC on the Fibonacci contract.
5. Beginning in April, 2008, defendant **LYNETTE C. JACKSON** began working as a full-time employee at Merito as a Digital Network Analyst. **LYNETTE C. JACKSON** was assigned to work exclusively on the Fibonacci contract at the NSA.

**COUNT ONE**

(False, Fictitious or Fraudulent Claims).

1. The factual allegations contained in Paragraphs 1 through 5 of the Introduction Section of this Information are realleged and incorporated herein as if copied verbatim.

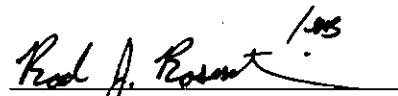
2. On or about May 27, 2011, within the District of Maryland and elsewhere, Defendant

**LYNNETTE C. JACKSON**

knowingly made and presented, and caused to be made and presented through Merito, to the NSA, a false, fictitious, and fraudulent claim against the United States for approximately \$4,390.74, by preparing and submitting a false time sheet claiming that she had worked forty-six (46) hours during that pay period, when in fact she had worked none.

All in violation of Title 18, United States Code, Sections 287 and 2.

Date: 4/25/14

  
\_\_\_\_\_  
ROD J. ROSENSTEIN  
United States Attorney